e-Manifest System
Webinar #3

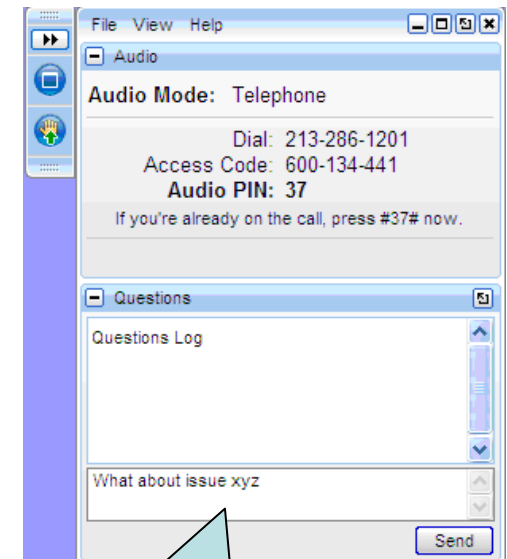## *Manifest Data Quality and e-Manifest Integration with Biennial Report*

June 9, 2009
1:00PM - 3:00PM EDT

Agenda

- Introduction
- Webinar Schedule
- Description of "Straw Man" Approach
- Discussion of the "Straw Man" Approach
- Discussion of Data Quality Issues
- Next Webinar

Introduction

- Facilitator: Janet Pershing
- Roll call
- Third of four scheduled webinars on e-Manifest
- Ground Rules
  - Lines will be muted until the discussion period starts.
  - Type in your questions and we'll review them at the Q&A period
- To help facilitate an orderly discussion, please send a typed question or comment to the facilitator by:
  - Typing your question into the Question Pane of GoTo meeting
  - Clicking the Send button
  - Your question will appear in the Question Log

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Audio

Audio Mode: Telephone

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If you're already on the call, press #37# now.

Questions

Questions Log

What about issue xyz

Send

Type your question here and click Send

Reasons to Consider Integrating e-Manifest and the Biennial Report

- Reduce user and State agency burden
- Improve e-Manifest data quality through
  - System-enforced data checks and aids
  - Enhanced incentive to report accurately and verify carefully
  - Additional opportunities in business process to correct data entries
- Realize potentially dramatic improvements in data timeliness
- Stakeholder meeting participants identified this as a high-priority effort

Commercial TSDF Biennial Report Activities

- Presentation by Dan Appelt of Safety-Kleen

• Do other industries have significantly different approaches to share?

State Biennial Report Activities – New Hampshire

- Collects manifests from generators, keypunches data into database, and performs QA/QC review. Follows up with generator and/or transporter if needed. There are no TSDFs
- Pre-populates Quarterly Reports with manifest data and sends them to generators for review/corrections, signature, and submittal
- Biennially, pre-populates Site ID Forms and sends them to generators. Site ID Forms summarize generator annual manifest data and supplemental information not on manifest (e.g., NAICS code, source codes)
- Compiles updated ID Forms, keypunches data into database, and sends data to EPA electronically as its Biennial Report submission

(Source: Maria Michel, New Hampshire Department of Environmental Services)

- Do other States have significantly different approaches to share?

EPA's Straw Man Approach for Integrating e-Manifest with Biennial Reporting

- The approach to be presented is not an EPA proposal – it is a "straw man"

- The intent is to generate discussion

- Webinar structure
  - Present the full straw man
  - Open up to comments topic by topic

- Requested feedback from participants
  - Strengths and weaknesses of each component of the "straw man" proposal
  - Specific examples of how the "straw man" system would/would not fit with current industry or State agency practices
  - Options for improving the "straw man" system

e-Manifest/Biennial Reporting Integration Concept

- Centralize data collection
  - All data needed for manifest, shipping papers, and Biennial Reporting entered into a single system
- Eliminate redundancy
  - Manifest and Biennial Reporting forms share many common data elements (e.g., waste quantity, waste codes, management method codes)
  - Enter data once to populate both required documents
- Some Biennial Report elements not on the manifest (e.g., source codes, waste form codes)
  - Enter all data once, up front, for greatest efficiency
  - "Smart System" will package the data as needed
  - Easy to add data used regularly via templates
  - Possible to add detail at any time before Biennial Report deadlines
- Separate steps for Biennial Reporting required for:
  - Generators that manage waste on-site
  - Users of paper manifests

"Straw Man" e-Manifest/Biennial Report Integration Process

1. Generator (or TSDF on Generator's behalf)
   - Enters shipment data
     - e-Manifest data required
     - Detail for the Biennial Report (e.g., Form Code, Source Code) recommended
   - e-Manifest system extracts data needed for e-Manifest/shipping paper
   - Other data remain associated with waste handler and its shipments for Biennial Report purposes

2. Transporter
   - Makes corrections (if necessary) before delivery
   - Automatic notification of corrections sent to generator

3. TSDF
   - Receives shipment, makes corrections, notes discrepancies as evident at time of delivery
   - Within 30 days, makes data corrections and notes discrepancies
   - Automatic notification of corrections sent to generator

"Straw Man" e-Manifest/Biennial Report Integration Process

4. State
   - Reviews system data and reconciles errors (optional)
   - Reconciles discrepancies

5. TSDF and Generator sign-off on Biennial Report data
   - TSDF/generator enter any Biennial Report detail that was not entered at initial data entry stage (e.g., source codes, waste form codes, enhanced descriptions)
   - TSDF sign-off on final data for Biennial Report submittal
   - Generator sign-off on final data for Biennial Report submittal

6. States
   - System extracts data needed for Biennial Report
   - Collect paper manifest Biennial Report data
   - Collect Biennial Report data for waste treated on site
   - Combine paper manifest and on-site data with system data

Discussion: "Straw Man" Key Assumptions

Assumptions

- Data entry needs to happen only once
- "Smart system" recognizes what data are required for each purpose and provides the correct level of detail.
  - Shipping papers
  - e-Manifest
  - Biennial Report
- Users must
  - Be able to make data corrections
  - Be informed of/agree to changes relevant to them
  - Review data and provide official sign-off for Biennial Report

Questions

- Realistic to combine data entry?
- Does a "smart system" for all three purposes make sense?

- Any other requirements?

Discussion: "Straw Man" Key Assumptions

Assumptions

- Detailed Biennial Report data (e.g., waste form codes)
    - Enter at any time prior to formal sign-off
    - Burden is minimized when details are provided at the outset
    - Pull down menus, reference tables, historic shipment data and templates will simplify detailed Biennial Report data entry

Questions

- Any issues about entering detailed data?

Discussion: "Straw Man" Key Assumptions

Assumptions

- System can receive data through
  - Direct data entry as e-Manifest is generated and corrected
  - Upload from waste handlers dealing with paper manifests
  - Supplemental data input for waste handlers dealing with paper manifests that have been keyed in by the National Operator
    - Profiles
    - Manual input
- Facilities that manage waste on-site must submit their Biennial Report forms separately because there will be no manifest data

Questions

- Any issues about getting data for paper manifests into the central data system?
- Does EPA need to retain the option of paper-based Biennial Report submission?

- Should facilities that manage waste on-site have the option of reporting through the integrated waste management system?

Discussion: "Straw Man" Key Assumptions

Assumptions

- Timeframes for correcting data will be established
- RCRA Land Disposal Restrictions impose a 1-year time limit for storage of untreated wastes

Questions

- What are appropriate timeframes for
  - "Received" shipment corrections?
  - "Accepted" shipment corrections?
- Are there situations in which further corrections are needed after "accepted" shipment corrections are made?

Discussion: "Straw Man" Key Assumptions

Assumptions

- Detailed data entry format will allow entry of
  - State-regulated waste codes
  - Additional waste codes (>6) needed for Biennial Report purposes
- States will have access to all data for quality monitoring and other State-specific purposes

Questions

- Any special considerations about State waste codes?

- Any issues related to State access to data about waste generated in or shipped to the State?

Discussion: Biennial Report Data Elements

EPA is aware of the need to adjust the level of detail on the following elements.:

- **Source codes** (describe how the waste originated)
  - Not required for e-Manifest
  - Could be set once in the generator profile/in a template
- **Waste form codes** (describe the physical form or chemical composition of the hazardous waste)
  - Not required for e-Manifest
  - Could be set once in the generator profile/in a template
- **Waste codes** (describe the specific waste regulated by EPA or by a State)
  - Only 6 codes in e-Manifest, but more would be collected and retained in system for BR purposes
- **Waste descriptions** (a narrative description of the waste)
  - Descriptions needed for Biennial Reporting are different from DOT needs
  - Smart system could display appropriate waste description as necessary for manifest or Biennial Report purposes

- Are these the right data element issues to be focusing on?
- What other data elements would need to be addressed?

Integration Issues for Paper Manifests

Assumptions

- Paper manifest data will be keyed in by the National Operator
- TSDFs will have the option to upload data from electronic records
- "Profiles" could be used to add Biennial Report level detail to the database with review from waste handlers
- Paper Biennial Reporting would remain an option

Questions

- Will TSDFs have supplementary data to upload for paper manifests?
- Would "profiles" be helpful for users to add the same type of information to each manifest associated with a particular generator?
- Who should be responsible for initiating/reviewing additions from the profile?
- Will paper Biennial Reporting remain a necessity for some waste handlers?

Discussion: Quantification of Waste

Assumptions
- Currently, approaches to quantification vary; this will continue to be the case
- Fields will be developed to allow various types of data input (weights, volumes, densities) to accommodate different approaches
- Tools can be provided (e.g., drop-down menus, reference tables, and conversion factors for waste densities)

Questions
- What quantification issues need to be resolved further prior to integrating e-Manifest and Biennial Reporting?
- Are there specific issues that EPA would need to consider when developing quantification data fields, beyond allowing specification of quantities, weights, and densities in various formats?
- Are the current units of measure specified in the manifest instructions adequate for future manifest and Biennial Report purposes?

Discussion: Technology

- Has your organization made technology investments that need to be considered if e-Manifest and Biennial Reporting are integrated?
  - What are the potential technology-related problems that you see?
  - How, if at all, could EPA mitigate these problems?

Discussion: Phasing

What implementation scheme appeals to you more if an integration process is implemented?

- **Phasing**:
  - Get the basic e-Manifest system functioning first and add Biennial Reporting features later.
  - Let users get used to the basics before adding another layer of complexity.

- **No Phasing**:
  - Implement e-Manifest with the Biennial Reporting features from the outset.
  - Make the full change so only a single major transition period is needed.

Discussion: Discrepancies

Assumptions

- The data base cannot accommodate conflicting data
- Generators will be notified of any change made to the system data.
- Three outcomes for discrepancies:
  - Resolved
  - Unresolved non-significant
  - Unresolved significant
- Time frames will be imposed for responding to changes
- If generator fails to respond within timeframe, system will default to TSDF data

Questions

- How common are unresolved discrepancies?
- How should the system deal with unresolved discrepancies?
  - Non-significant
  - Significant
- What response time frames would be appropriate?

Discussion: Quality Assurance

Assumptions
- Some State programs will review and make corrections to system data
- An audit trail will indicate who makes changes and when
- Waste handlers will have the opportunity to review and 'sign off' on data prior to submission for the Biennial Report

Questions
- How should corrections be coordinated between waste handlers and States?
- What additional procedures/controls on manifest corrections and data quality are needed to ensure that the data are acceptable for BR purposes?

Discussion: Intermediate Facilities

Assumptions

- Waste that passes through an intermediate facility (e.g., storage facility) risks being double-counted, for example when waste shipments are commingled and a new manifest is prepared

Questions

- Would distinguishing between "offerors" and generators on the manifest be sufficient to avoid double-counting waste?

- Alternatively, could this issue be addressed through a specific code that identifies wastes not generated by the offeror?

- What additional steps may be necessary?

Discussion: The Big Picture

- Thinking about the "straw man" concept:
    - What aspects of this approach would be particularly helpful or detrimental?
    - Where would savings be realized and what would the negative impacts be?
- What additional systems or controls are needed to improve the "straw man"?
- Would you propose an alternative to the "straw man" process in whole or in part?

Additional Input

Please send additional comments for EPA to emanifest@icfi.com:

- Additional suggestions
    - Concerns
    - Alternate approaches
- Examples
    - How your organization coordinates its manifest/ Biennial Report activities
    - In what ways your operations would/ would not be compatible with the "straw man" approach
- Estimates
    - Number of hours or dollars the "straw man" approach could save or cost your organization
    - Specific observations about why/how the "straw man" approach will affect your program
    - Anecdotal information to illustrate costs or savings

Next Webinar

- Final Webinar will be held on June 23, 2009, from 1:00 to 3:00 PM EDT
- Topics:
    - Practical Expectations for System Performance
    - Anticipated Stakeholder Benefits From An Electronic Data System
- A reminder will be e-mailed to you